

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA**

**IN THE MATTER OF THE SEARCH OF
U.S. POSTAL SERVICE PRIORITY
MAIL PARCELS BEARING TRACKING
NUMBERS 9405 5362 0624 8275 8700 45,
9405 5362 0624 8293 2135 41, AND 9405
5362 0624 8302 2363 32**

Case No. 3:24-mj-71

Filed Under Seal

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Todd C. Phillips, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for three U.S. Postal Service Priority Mail parcels to search for controlled substances and/or narcotics proceeds (currency). The parcels to be searched are all addressed to Brandon Keesecker, 196 Cannon Hill Road, Hedgesville, WV 25427. Parcel **9405 5362 0624 8275 8700 45** has a return address of Golfcartstuff.com, 12626 Nicklaus Lane, Tustin, CA 92782 (hereinafter referred to as “**PARCEL #1**”), parcel **9405 5362 0624 8293 2135 41** has a return address of Golfcartstuff.com, 4218 Franklin Avenue, Fullerton, CA 92833 (hereinafter referred to as “**PARCEL #2**”), and parcel **9405 5362 0624 8302 2363 32** has a return address of Golfcartstuff.com, 2626 Tiffany Place, Fullerton, CA 92833 (hereinafter referred to as “**PARCEL #3**”)

2. Your Affiant is a Special Agent with the United States Postal Service, Office of Inspector General (USPS-OIG) and has been since September 2012. Your affiant is currently assigned to the Mid-Atlantic Area Field Office – Roanoke Sub-Office. I have participated in numerous investigations including narcotics trafficking, mail theft, and financial fraud. I have also

completed the Criminal Investigator Training Program at the Federal Law Enforcement Training Center.

3. The facts and information contained in this affidavit are based on my personal knowledge as well as that of the other law enforcement involved in this investigation. All observations that were not made personally by me were related to me by the persons who made the observations. Sources of information used routinely in this process include verifying zip codes through a public database maintained by the U.S. Postal Service (*USPS.com*) and checking associations between names and addresses in a law enforcement database (*Accurint*). This affidavit contains only that information necessary to establish probable cause in support of an application for the requested search warrant. This affidavit is not intended to include each and every fact and matter observed by or made known to agents of the government and it does not set forth all of my knowledge, or the knowledge of others, about this matter.

4. Based on my training and experience and the facts set forth in this affidavit, there is probable cause to believe that controlled substances and/or narcotics proceeds (currency) will be found in **PARCEL #1**, **PARCEL #2**, and **PARCEL #3** in violation of Title 21, United States Code, Section 841(a)(1), possession with intent to distribute controlled substances, and Title 21, United States Code, Section 846, conspiracy to possess with intent to distribute controlled substances.

BACKGROUND ON DRUG TRAFFICKING

5. Your affiant knows based on training and experience that the U.S. Mail is often used by drug traffickers and drug trafficking organizations to transport controlled substances and proceeds from the sale of illegal narcotics throughout the United States and its territories. Drug trafficking intelligence gained over the years has shown that drug traffickers utilize the U.S. Postal

Service (USPS) for shipping controlled substances such as marijuana, cocaine, heroin, fentanyl, and methamphetamine. Additionally, your affiant is aware that USPS Priority Mail and Priority Mail Express are commonly used to transport controlled substances and proceeds from the sale of illegal narcotics because drug traffickers can reliably track parcels, control dispatch times and locations, and have a guarantee of delivery in one to three days.

6. The USPS-OIG, U.S. Postal Inspection Service, Drug Enforcement Administration, and other intelligence sources have identified California as a major source area for the flow of controlled substances throughout the United States. As such, controlled substances are frequently transported from California via the USPS and proceeds from the sale of controlled substances are frequently returned to California via the USPS.

7. Drug traffickers frequently use fictitious names on both the recipient address section and the return address section of the mailing label to remain anonymous and evade detection. Some return addresses are legitimate addresses, but the actual resident at those locations is either fictitious or non-existent. They also use legitimate or fictitious businesses as the return address to give the parcel the appearance of legitimacy.

8. Your affiant knows drug traffickers and drug trafficking organizations may purchase USPS postage using cryptocurrency. Cryptocurrency is a digital asset designed to work as a medium of exchange that is secured by cryptography, which makes it nearly impossible to counterfeit or double spend. Many cryptocurrencies are decentralized networks based on blockchain technology – a distributed ledger maintained by a disparate network of computers. Cryptocurrency adds a level of anonymity, making it more difficult to determine the identity of the person purchasing the postage.

BACKGROUND ON FACTORS INDICATING CONTRABAND

9. Based upon my training and experience, I know that there are suspicious characteristics common to many parcels that contain narcotics, controlled substances or narcotics proceeds (currency), and personal and financial documents related to such proceeds and narcotics. These factors, detailed more fully below, are used as a pointer system to identify parcels requiring further investigation.

10. A totality of factors or characteristics creates reasonable suspicion prior to presenting a parcel to a canine for examination. **PARCEL #1, PARCEL #2, and PARCEL #3** exhibited several of these factors and were also alerted to by a trained canine. While there are many characteristics that experienced Special Agents look for, the most common factors or suspicious characteristics routinely observed in the course of screening parcels are set forth in the paragraphs below.

11. **Contrasts observed between Legitimate Business Parcels and Drug Parcels:** As alternatives to Ground Advantage Parcel Mail, which does not always provide a customer with the ability to track the progress of a parcel through the system, the USPS offers Priority Mail Express and Priority Mail.

- a. Priority Mail Express: Priority Mail Express is guaranteed to be delivered on a set date and time, usually overnight (the deadline is determined at the time of mailing). The customer receives a receipt with this guaranteed information and can opt for a signature requirement when the parcel is delivered. Customers can track the parcel online by its distinct Priority Mail Express tracking number. The weight of the parcel and the distance traveled are the two main factors in setting the price. Priority Mail Express costs more than Priority Mail. Businesses using Priority Mail Express

typically have a business or corporate account visible on the mailing label, which covers the cost of the mailing, in contrast to the drug distributor who will pay at the counter with cash or a credit card.

- b. Priority Mail: Priority Mail has a delivery service standard of two to four business days, but is not guaranteed. Priority Mail is a less expensive alternative to Priority Mail Express, but still provides the ability to track a parcel. Business Priority Mail Express Parcel(s) typically weigh no more than eight ounces, and business Priority Mail Parcel(s) typically weigh no more than two pounds. Drug parcels typically exceed these weights; in my experience, it is fairly easy to separate out smaller parcels, which constitute seventy to eighty percent of all Priority Mail Express and Priority Mail Parcel(s), from other parcels. Address labels on business parcels are typically typed, and address labels on drug parcels are typically handwritten. Additionally, drug traffickers using Priority Mail Express will opt out of the signature requirement.
- c. Ground Advantage Parcel Mail: Some individuals mailing illicit narcotics through the USPS are now utilizing both Ground Advantage parcel service with and without tracking as a way to obscure their illicit activity and to circumvent law enforcement profiling efforts. Ground Advantage parcels containing illicit narcotics may weigh less than one pound, or even be mailed in flat envelopes, depending on the type of narcotic involved.

12. **Invalid Sender/Return Address**: When drugs are shipped through the mail, the senders generally do not want them back. To distance themselves from parcel(s) containing drugs, the return addresses and the names of senders are often fictitious or false. A fictitious or false

address can be anything from an incorrect zip code to a non-existent house number or street. The name of the sender is also typically invalid: I have seen parcels sent by persons with names of celebrities, cartoon characters, or fictional persona, but more often a search of the *Accurint* database reflects that there is no association between the name of the sender and the address provided.

13. **Invalid Recipient/Address:** It may appear counter-productive to put the wrong receiving address on a parcel, but often the named recipient is not associated with the address. This provides plausible deniability to anyone receiving the parcel as to their knowledge of its contents. Sometimes drug parcels are addressed to vacant properties with the expectation that the postal carrier will just leave it at the delivery address. The intended recipient will then retrieve it from that location and hope to remain anonymous.

14. **State of Origin:** If other criteria are present, I know from experience and training that domestic parcel(s) originating from identified source states where narcotics trafficking is more prevalent, can be one of the many indicators that a parcel contains controlled substances. Furthermore, subsequent parcel(s) mailed from the destination state back to the state of origin can indicate a parcel contains proceeds from the sale of those illegal narcotics.

15. **Electronic Postage:** The USPS created electronic postage as a service for frequent mailers and businesses who prefer printing address labels and purchasing postage from their residence or business. In my training and experience, drug traffickers may sometimes create electronic postage accounts as a means of giving legitimate appearance to their drug mailings. In these cases, they typically create the accounts using fictitious account information and often provide pre-paid credit cards as a means of payment, which are difficult to track. Drug traffickers often use legitimate business return addresses in states other than known “source” states as a means

to deter detection, as these other states are not usually considered “source” states for controlled substances and proceeds from the sale of controlled substances. The postage labels are printed/typed unlike the typical drug-related mailing label, which is routinely handwritten.

16. **Additional Factors:** Additional factors seen less frequently, but nevertheless noteworthy, include:

- a. Smell: The odors of cocaine, marijuana, and methamphetamine are distinct, and, through experience, law enforcement officers are familiar with these odors. On occasion, a parcel will emit an odor that is easily recognized without the assistance of a canine. Other smells that suggest the contents are narcotics are from masking agents. Common masking agents used in an attempt to thwart law enforcement and canines typically include dryer sheets, coffee, scented oils, mustard, and any other substance that releases a strong smell.
- b. Packaging: Heavily taped parcels are another factor that will suggest its contents contain controlled narcotics or the proceeds from the sale of controlled narcotics. I have also observed excessive glue on parcel flaps.

17. It is my experience that when a combination of the factors outlined above are observed, a drug detection canine will likely “alert” next to the parcel, indicating the dog has detected the presence of narcotics. As a result, these factors become a reliable way to profile parcels being shipped every day.

PROBABLE CAUSE

18. This affidavit is submitted in support of an application for a search warrant for three U.S. Postal Service Priority Mail parcels to be searched for controlled substances and/or narcotics proceeds (currency).

19. **PARCEL #1** is described as follows:

- A. Addressee: Brandon Keesecker, 196 Cannon Hill Road, Hedgesville, WV 25427
- B. Return Address: Golfcartstuff.com, 12626 Nicklaus Lane, Tustin, CA 92782
- C. Postage Affixed: Priority Mail, Origin: 92782, Postage: \$68.17 Paid with Cryptocurrency, Date: June 15, 2024 – Printed label.
- D. Tracking Number: 9405 5362 0624 8275 8700 45
- E. Description: Large brown box with brown tape, weighs approximately 21 pounds.

20. **PARCEL #2** is described as follows:

- A. Addressee: Brandon Keesecker, 196 Cannon Hill Road, Hedgesville, WV 25427
- B. Return Address: Golfcartstuff.com, 4218 Franklin Avenue, Fullerton, CA 92833
- C. Postage Affixed: Priority Mail, Origin: 92833, Postage: \$96.99 Paid with Cryptocurrency, Date: June 18, 2024 – Printed label.
- D. Tracking Number: 9405 5362 0624 8293 2135 41
- E. Description: Large brown box with brown tape, weighs approximately 26 pounds.

21. **PARCEL #3** is described as follows:

- A. Addressee: Brandon Keesecker, 196 Cannon Hill Road, Hedgesville, WV 25427
- B. Return Address: Golfcartstuff.com, 2626 Tiffany Place, Fullerton, CA 92833
- C. Postage Affixed: Priority Mail, Origin: 92833, Postage: \$43.96 Paid with Cryptocurrency, Date: June 19, 2024 – Printed label.
- D. Tracking Number: 9405 5362 0624 8302 2363 32
- E. Description: Large brown box with brown tape, weighs approximately 14 pounds.

22. Your affiant identified **PARCEL #1**, **PARCEL #2**, and **PARCEL #3** during routine parcel interdiction on June 20 and June 21, 2024. Your affiant intercepted **PARCEL #1** on June 20, 2024, **PARCEL #2** on June 21, 2024, and **PARCEL #3** on June 26, 2024, all at the Hedgesville, WV post office. **PARCEL #1**, **PARCEL #2**, and **PARCEL #3** were all mailed from the Los Angeles, CA area, a known source for controlled substances shipped via the USPS into the Northern District of West Virginia. USPS records revealed the postage for **PARCEL #1**, **PARCEL #2**, and **PARCEL #3** were paid for with cryptocurrency. A photograph of **PARCEL #1** is included in

Attachment A, a photograph of **PARCEL #2** is included in Attachment B, and a photograph of **PARCEL #3** is included in Attachment C. At this time, **PARCEL #1**, **PARCEL #2**, and **PARCEL #3** are located at the West Virginia State Police Martinsburg, WV Detachment in the Northern District of West Virginia. The parcels have been maintained unopened pending application for a search warrant.

23. Your affiant made inquiries via Accurant, an electronic database that has proven reliable in previous investigations in determining the legitimacy of name, address, and phone number information. The name of the recipient, “Brandon Keesecker” was able to be associated with the delivery address “196 Cannon Hill Road, Hedgesville, WV 25427.” The name of the sender, “Golfcartstuff.com” was unable to be associated with any of the return addresses “12626 Nicklaus Lane, Tustin, CA 92782”, “4218 Franklin Avenue, Fullerton, CA 92833”, or “2626 Tiffany Place, Fullerton, CA 92833”. Additionally, a basic Google search of “Golfcartstuff.com” detailed their business locations as 2900 Gateway Drive, Elkhart, IN 46514.

24. On June 24 and June 26, 2024, your affiant requested a narcotic detection canine from the West Virginia State Police. Senior Trooper B.F. Gorondy, and his narcotic detection canine “Dak,” responded to the Hedgesville, WV Post Office located at 5471 Hedgesville Road, Hedgesville, WV 25427. **PARCEL #1**, **PARCEL #2**, and **PARCEL #3** were placed in three separate parcel line-ups and subjected to an exterior free air sniff by canine “Dak.” Senior Trooper B.F. Gorondy advised your affiant that canine “Dak” positively alerted to **PARCEL #1** on June 24, 2024, at approximately 11:10 a.m., **PARCEL #2** on June 24, 2024, at approximately 11:15 a.m., and **PARCEL #3** on June 26, 2024, at approximately 10:07 a.m. According to Senior Trooper B.F. Gorondy, canine “Dak” gave a positive alert to the presence of a narcotic odor emanating from suspect **PARCEL #1**, **PARCEL #2**, and **PARCEL #3**.

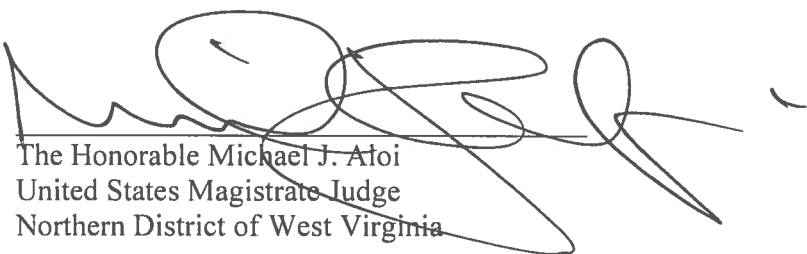
CONCLUSION

25. Based on the information contained herein, your affiant maintains there is probable cause to believe that USPS Priority Mail **PARCEL #1**, **PARCEL #2**, and **PARCEL #3** addressed to "Brandon Keesecker, 196 Cannon Hill Road, Hedgesville, WV 25427" contain controlled substances which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.



Todd C. Phillips
Special Agent
U.S. Postal Service Office of Inspector General

Subscribed and sworn to before me this 28th day of June, 2024.



The Honorable Michael J. Atoi
United States Magistrate Judge
Northern District of West Virginia



ATTACHMENT A

PROPERTY TO BE SEARCHED

The property to be searched is addressed to Brandon Keesecker, 196 Cannon Hill Road, Hedgesville, WV 25427, with a return address of 12626 Nicklaus Lane, Tustin, CA 92782. The parcel bears tracking number 9405 5362 0624 8275 8700 45. The postage affixed is Priority Mail service with an origin of 92182 bearing postage paid with cryptocurrency with a date of June 15, 2024. The parcel is described as a large brown box with brown tape, weighing approximately 21 pounds. A picture of the parcel is below:



ATTACHMENT B

PROPERTY TO BE SEARCHED

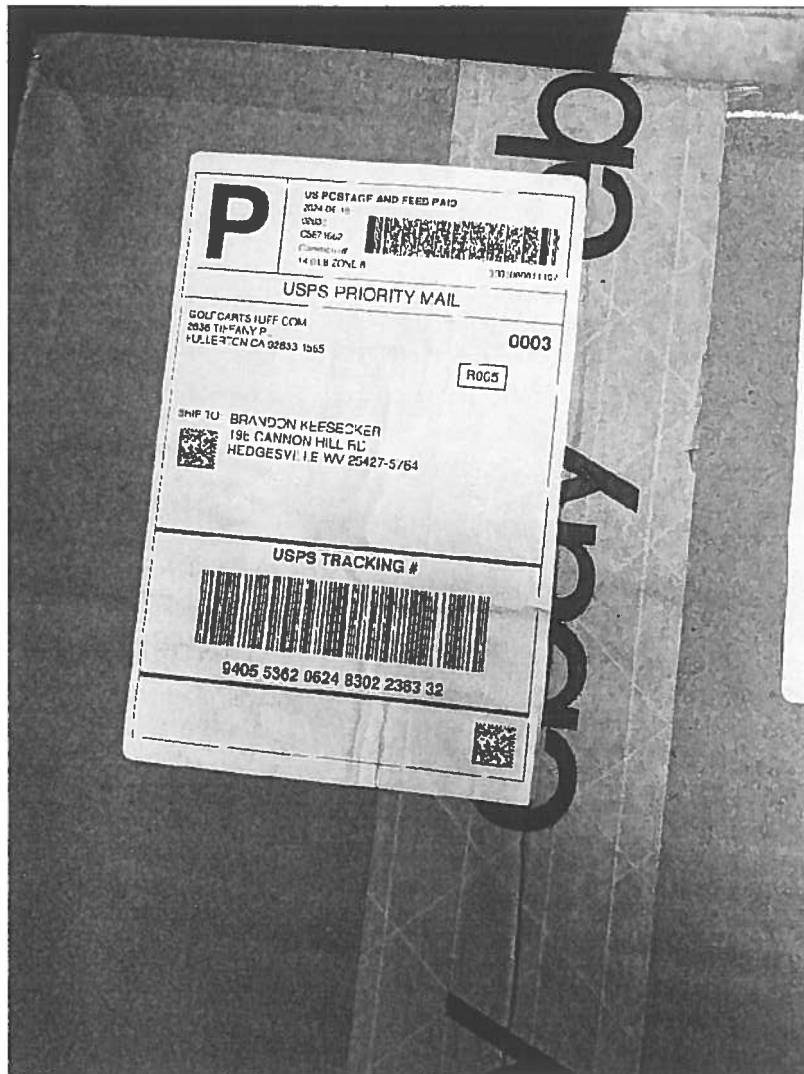
The property to be searched is addressed to Brandon Keesecker, 196 Cannon Hill Road, Hedgesville, WV 25427, with a return address of 4218 Franklin Avenue, Fullerton, CA 92833. The parcel bears tracking number 9405 5362 0624 8293 2135 41. The postage affixed is Priority Mail service with an origin of 92833 bearing postage paid with cryptocurrency with a date of June 18, 2024. The parcel is described as a large brown box with brown tape, weighing approximately 26 pounds. A picture of the parcel is below:



ATTACHMENT C

PROPERTY TO BE SEARCHED

The property to be searched is addressed to Brandon Keesecker, 196 Cannon Hill Road, Hedgesville, WV 25427, with a return address of Golfcartstuff.com, 2626 Tiffany Place, Fullerton, CA 92833. The parcel bears tracking number 9405 5362 0624 8302 2363 32. The postage affixed is Priority Mail service with an origin of 92833 bearing postage paid with cryptocurrency with a date of June 19, 2024. The parcel is described as a large brown box with brown tape, weighing approximately 14 pounds. A picture of the parcel is below:



ATTACHMENT D

ITEMS TO BE SEIZED

1. Any controlled substances as defined by the Uniform Controlled Substances Act; and
2. Any proceeds (currency) from the sale of controlled/illegal substances; and
3. Materials used to parcel, conceal, and distribute controlled substances and/or proceeds from the sale of controlled/illegal substances.

All of the above being evidence and instrumentalities of possession with intent to distribute controlled substances and conspiracy to possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.